

### REMARKS

Claims 15 and 18 have been canceled without disclaimer, leaving claims 1-14, 16 and 17 currently pending. Claims 1 and 8 are being amended. Reconsideration of this application is respectfully requested.

Claims 15 and 18 have been canceled without disclaimer.

The Office Action dated September 9, 2004, includes a rejection of claims 1-14 and 16-17 under 35 U.S.C. § 103(a) as allegedly being unpatentable over the Fukuchi publication in view of the Dowling patent (U.S. Patent No. 5,553,167). This rejection is respectfully traversed.

In the Advisory Action mailed on December 28, 2004, it was alleged that the claims did not recite a configuration of line memories that outputs a pixel matrix, and that therefore the claims do not correspond to the remarks submitted on December 3, 2004. In response to that comment, the claims have been further amended to recite a configuration of line memories that forms a pixel matrix.

In view of the amended claims, Applicants again respectfully submit that the Office's rejection does not make out a *prima facie* case of obviousness. Even if, for the sake of argument, the Fukuchi image processing system were hypothetically modified to implement the Dowling filter as suggested by the Office, the resulting hypothetical apparatus would not possess the combination of features recited in independent claims 1 and 8.

According to subject matter recited in claims 1 and 8, a configuration of the line memories, which forms a pixel matrix used for image processing, is rewritten according to setting information stored in a memory and based on an image

processing condition. However, neither the Fukuchi publication nor the Dowling patent disclose rewriting a configuration of line memories that output a pixel matrix, as discussed below.

In particular, contrary to the Office's suggestion, the Fukuchi publication contains no indication of forming and outputting a pixel matrix **in parallel** using a FIFO circuit. Figure 9 of the Fukuchi publication discloses two FIFO memories connected in parallel, but as disclosed at paragraph 30 therein, the FIFO memory is used for adjustment of time delay of data. There is no indication in the Fukuchi publication of using FIFO memory for forming a pixel matrix and outputting the pixel data **in parallel**.

With regard to FIFO circuit 50 cited by the Office, paragraph 32 of the Fukuchi publication discloses that data are input into each of the FIFO memories 51 and 52 of Figure 9 one dot at a time in turn, and the data are outputted from the FIFO memories 51 and 52 in turn. As illustrated in Figure 9, **the data outputted from the FIFO memories 51 and 52 are integrated and provided to the subsequent device serially**, which is evident because the output terminals of the FIFO memories 51 and 52 are connected. Accordingly, the FIFO memories 51 and 52 cannot output a pixel matrix to the filtering circuit **in parallel**. The FIFO circuit 60 of Figure 10 is understood to be an alternative FIFO circuit for adjusting a time delay of data (see, e.g., lines 10-14 of paragraph 12); FIFO circuit 60 does not possess a plurality of line memories and does not make up for the deficiencies of the FIFO circuit 50 noted above. Thus, it is evident that the Fukuchi publication does not disclose rewriting a configuration of the line memories, which form a pixel matrix used for image processing, according to image-processing conditions.

In addition, the Dowling patent contains no disclosure of rewriting a configuration of line memories, which form a pixel matrix used for image processing, according to an image processing condition (e.g., contains no description of connecting FIFO memories in parallel). Accordingly, the Dowling patent does not make up for the deficiencies of the Fukuchi publication discussed above.

Thus, even if, for the sake of argument, the disclosures of the Fukuchi publication and Dowling patent were hypothetically combined as suggested by the Office, the resulting combination would still not possess the combinations of features recited in claims 1 and 8. Withdrawal of the rejection and allowance of claims 1 and 8 are respectfully requested for at least the above-noted reasons.

Claims 2-7, 9-14 and 16-17 depend variously from claims 1 and 8.


Accordingly, claims 2-7, 9-14 and 16-17 are allowable at least by virtue of dependency.

In light of the above, Applicants respectfully request that the rejections of record be withdrawn and that the above-identified application be allowed. Should there be any questions in connection with this matter, the Office is invited to contact the undersigned at the number given below.

Respectfully submitted,

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